

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
EXXON MOBIL CORPORATION,

Plaintiff,

v.

TREDEGAR CORPORATION,

Defendant.
----- X

Civil Action No. 11-cv-02829 (MGC)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Daniel B. Carroll, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name:	Matthew A. Luber
Firm Name:	Drinker Biddle & Reath LLP
Address:	One Logan Square, Suite 2000
City/State/Zip:	Philadelphia, PA 19103-6996
Phone Number:	(215) -988-2700
Fax Number:	(215) -988-2757

Matthew A. Luber is a member in good standing of the Bar of the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against Matthew A. Luber in any State or Federal court.

Dated: October 8, 2012

Respectfully submitted,

By: /s/ Daniel B. Carroll
Daniel B. Carroll
S.D.N.Y. Bar Number DB8028
NY Bar Number 2707685
500 Campus Drive
Florham Park, NJ 07932-1047
(973) 549-7000
(973) 360-9831

Attorney for Plaintiff
Exxon Mobil Corporation

UNITED STATES DISTRICT COURT
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**DECLARATION OF DANIEL B.
CARROLL IN SUPPORT OF MOTION
TO ADMIT COUNSEL *PRO HAC VICE***

1. I am a partner of Drinker Biddle & Reath LLP, counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Matthew A. Lubner as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in October 1995. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am in good standing of this Court. A copy of Matthew A. Lubner's certificate of good standing is attached as Exhibit A.

3. I have known Matthew A. Lubner since 2010.

4. Matthew A. Lubner is an associate of Drinker Biddle & Reath LLP in Philadelphia, Pennsylvania.

5. I have found Mr. Lubner to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Matthew A. Lubner, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Matthew A. Luber, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Matthew A. Luber, *pro hac vice*, to represent Plaintiff in the above-captioned matter, be granted.

Dated: October 8, 2012

Respectfully submitted,

By: /s/ Daniel B. Carroll
Daniel B. Carroll
S.D.N.Y. Bar Number 2707685
500 Campus Drive
Florham Park, NJ 07932-1047
(973) 549-7000
(973) 360-9831

Attorney for Plaintiff
Exxon Mobil Corporation

EXHIBIT A



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Matthew Allen Luber, Esq.

DATE OF ADMISSION

November 24, 2010

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: September 28, 2012

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

EXHIBIT B

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**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Daniel B. Carroll, attorney for plaintiff Exxon Mobil Corporation,
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

Applicant's Name:	Matthew A. Luber
Firm Name:	Drinker Biddle & Reath LLP
Address:	One Logan Square, Suite 2000
City/State/Zip:	Philadelphia, PA 19103-6996
Telephone/Fax:	(215) 988-2700/(215) 988-2757
E-mail Address:	matthew.luber@dbi.com

is admitted to practice *pro hac vice* as counsel for Exxon Mobil Corporation in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:
City, State:

United States District/Magistrate Judge

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON October 8, 2012, I caused to be electronically filed PLAINTIFF EXXON MOBIL CORPORATION'S MOTION TO ADMIT COUNSEL PRO HAC VICE, DECLARATION OF DANIEL B. CARROLL IN SUPPORT OF MOTION TO ADMIT COUNSEL, EXHIBIT A, CERTIFICATE OF GOOD STANDING OF MATTHEW A. LUBER, ESQ., AND EXHIBIT B, PROPOSED ORDER FOR ADMISSION, utilizing the Court's CM/ECF system which automatically sends notice of such filings to all attorneys of record.

Dated: October 8, 2012

Respectfully submitted,

By: /s/ Daniel B. Carroll
Daniel B. Carroll
S.D.N.Y. Bar Number 2707685
500 Campus Drive
Florham Park, NJ 07932-1047
(973) 549-7000
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Attorney for Plaintiff
Exxon Mobil Corporation